

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARK NUNEZ, et al.,
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Plaintiffs,
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- against -
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11 Civ. 5845 (LTS)(JCF)
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CITY OF NEW YORK, et al.,
:
:
Defendants.
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**DECLARATION OF BRENDA
COOKE**
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UNITED STATES OF AMERICA,
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Plaintiff-Intervenor,
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:
- against -
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CITY OF NEW YORK and NEW YORK CITY
DEPARTMENT OF CORRECTION,
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:
Defendants.
:
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BRENDA COOKE hereby declares as follows:

1. I am the Executive Agency Counsel for Special Projects & Government Affairs for the New York City Department of Correction (“DOC” or “Department”).
2. On July 10, 2015, the Court entered its Order Preliminarily Approving Consent Judgment, Approval of Class Notice and Revision to Definition of Certified Class (ECF No. 214) (the “Order”). The Order attached the approved Notice of Proposed Class Action Settlement (the “Notice”) and outlined the required method for giving class notice.
3. The Order specified that “[n]o later than ten (10) days after the entry of this Order, the Department shall post copies of the Class Notice in English and in Spanish in areas of the law libraries, housing areas, and receiving rooms of each jail where it is reasonably

calculated to be seen by inmates in the area, and such copies shall remain posted until the day after valid objections to the proposed Consent Judgment must be postmarked pursuant to Paragraph 5 of this Order. In addition, the Department shall deliver on two consecutive Saturdays (the second and third Saturdays after the date of this Order) a copy of the Class Notice in English and in Spanish to every member of the Plaintiff Class who, at the time of the distribution, is confined in a unit or housing area in which the inmate is held in a cell twenty-three (23) hours per day, including but not limited to all twenty-three (23) hour lock-in punitive segregation units (PSEG I) and all contagious disease units.” *Id.* at ¶ 4.

4. I personally oversaw the dissemination of the Notice, in English and in Spanish, to Department staff for posting in the City jails pursuant to the Order. DOC complied with the notice requirements of paragraph 4 of the Order.

I declare that the foregoing is true to the best of my knowledge, information and belief.

Executed on October 2, 2015.

/s/ Brenda Cooke
Brenda Cooke